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JUL 14 2008
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY <i>[Signature]</i> DEPUTY

## UNITED STATES DISTRICT COURT

## SOUTHERN DISTRICT OF CALIFORNIA

**'08 MJ 8629**

UNITED STATES OF AMERICA, ) Magistrate Case No.:  
                                ) Plaintiff,              ) COMPLAINT FOR VIOLATION OF  
                                )                          ) 21 U.S.C. § 952 and 960  
                                v.                         ) Importation of a Controlled  
                                Sergio VENEGAS-      ) Substance (Felony)  
                                Martin Del Campo,     )  
                                Defendant.             )

The undersigned complainant being duly sworn states:

That on or about July 12, 2008, within the Southern District of California, defendant Sergio VENEGAS-Martin Del Campo, did knowingly and intentionally import approximately 22.82 kilograms (50.20 pounds) of cocaine a schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
 Paul Lewenthal, Senior Special Agent  
 U.S./Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence this 14<sup>th</sup> day of July 2008.

  
 PETER C. LEWIS  
 U.S. MAGISTRATE JUDGE

UNITED STATES OF AMERICA  
1 v.  
2 Sergio VENEGAS-Martin Del Campo  
3

4 STATEMENT OF FACTS  
5

6 This complaint is based on the reports, documents, and notes  
7 furnished to U.S. Immigration and Customs Enforcement Special  
8 Agent Paul Lewenthal.

9 On July 12, 2008, at approximately 1325 hours, Sergio  
10 VENEGAS-Martin Del Campo attempted to enter into the United  
11 States at the Calexico, California, West Port of Entry, from the  
12 Republic of Mexico. VENEGAS was the driver, sole occupant, and  
13 registered owner of a 2003 Mitsubishi Montero bearing California  
14 license plates 6DNP744.

15 Canine Enforcement Officer (CEO) J. Jones was conducting a  
16 preprimary inspection with his canine and inspected VENEGAS'  
17 vehicle as VENEGAS presented himself for inspection. The canine  
18 gave a positive alert to the rear seat area. CEO Jones informed  
19 Customs and Border Protection Officer (CBPO) Navarro of the  
20 alert. VENEGAS was escorted into the secondary inspection office  
21 and his vehicle was driven to the secondary vehicle lot.

22 As VENEGAS was being walked to the secondary inspection  
23 office, CBPO Mendibles received a negative Customs declaration  
24 from VENEGAS. CBPO Mendibles asked VENEGAS who owned the vehicle.  
25 VENEGAS told CBPO Mendibles the vehicle belonged to him. CBPO  
26 Mendibles inspected the interior of the vehicle where he located  
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1 two access plates leading to the gas tank. CBPO Mendibles removed  
2 the access plates and discovered twenty (20) packages inside the  
3 gas tank. A package was probed by CBPO Mendibles revealing a  
4 white powdery substance, which field-tested positive for cocaine.  
5 The total weight of the cocaine packages was 22.82 kilograms  
6 (50.20 pounds).  
7

8 VENEGAS was arrested for importation of cocaine into the  
9 United States. VENEGAS was advised of his rights, in Spanish, by  
10 Special Agent P. Lewenthal. VENEGAS stated he understood his  
11 rights and agreed to answer questions without the presence of an  
12 attorney. VENEGAS admitted knowledge of the cocaine concealed in  
13 the vehicle stating he was going to be paid \$2,000.00 to smuggle  
14 the cocaine to Calexico, California.  
15

16 VENEGAS was transported to the Imperial County Jail to await  
17 his Initial Appearance before a U. S. Magistrate Judge in El  
18 Centro, California.  
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